

EXHIBIT C

LAKESHA STEVENSON
UNITED STATES vs STATE OF GEORGIA

September 22, 2022

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4

5 UNITED STATES OF)
6 AMERICA,)
7 Plaintiff,)
8 vs.)
9 STATE OF GEORGIA,) Civil Action No.
10 Defendant.) 1:16-CV-03088-ELR
11 _____)
12

13 DEPOSITION OF
14 LAKESHA STEVENSON
15

16 DATE: Thursday, September 22, 2022
17

18 TIME: 9:00 a.m. - 5:26 p.m.
19

20 LOCATION: 500 Fourteenth Street Northwest
21 Atlanta, Georgia 30318
22

23 REPORTED BY: Tamika Burnette, RPR, CSR No. 2870
24
25

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1 Q. Well, actually, just pause for one second. 09:32AM

2 THE VIDEOGRAPHER: Yeah, let's go off the 09:32AM
3 record. 09:32AM

4 MS. TUCKER: Yes, we'll go off the record 09:32AM
5 for one second. 09:33AM

6 (Off the record.) 09:33AM

7 THE VIDEOGRAPHER: At 9:34 a.m. 09:33AM

8 (Off the record at 9:34 a.m.) 09:35AM

9 THE VIDEOGRAPHER: Stand by. Back on the 09:35AM
10 record at 9:36 a.m. 09:35AM

11 Q. BY MS. TUCKER: Dr. Stevenson, let's turn back 09:35AM
12 to your resume that starts with GA02598823, just to 09:35AM
13 learn a little bit more about your professional 09:35AM
14 background. 09:35AM

15 Who is your current employer? 09:35AM

16 A. Georgia Department of Education. 09:36AM

17 Q. Okay. And this is in the GNETS program 09:36AM
18 specialist role? 09:36AM

19 A. Yes. 09:36AM

20 Q. Okay. When did you officially assume this 09:36AM
21 position? 09:36AM

22 A. In 2018. 09:36AM

23 Q. Do you remember what month? 09:36AM

24 A. I do not. 09:36AM

25 Q. Okay. And then who did you interview with? 09:36AM

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1 A. I know Vickie Cleveland was there, and I do not 09:36AM
2 remember who else was there. 09:36AM

3 Q. Okay. Do you remember if it was quickly after 09:36AM
4 you applied? 09:36AM

5 A. I do not. 09:36AM

6 Q. Okay. And do you report to Vickie Cleveland? 09:36AM

7 A. Yes. 09:36AM

8 Q. Okay. And earlier you said her role was 09:36AM
9 program manager -- 09:36AM

10 A. Yes. 09:36AM

11 Q. -- for GNETS? 09:36AM

12 A. Yes. 09:36AM

13 Q. Okay. Have you always reported to Vickie 09:36AM
14 Cleveland in this role? 09:36AM

15 A. In this role, yes. 09:36AM

16 Q. Okay. Did you know Vickie Cleveland before 09:37AM
17 assuming this position? 09:37AM

18 A. Yes. 09:37AM

19 Q. Okay. How did you know Vickie Cleveland? 09:37AM

20 A. We worked at the Georgia Department of 09:37AM
21 Education together. 09:37AM

22 Q. Okay. In what roles in GaDOE had you worked 09:37AM
23 together before? 09:37AM

24 A. She was a program specialist for the 09:37AM
25 Results-Driven Accountability unit, and I also was a 09:37AM

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1 A. It was discussed during preplanning. There's a 09:48AM
2 presentation of a lot of different things and that was 09:48AM
3 one of the things they discussed. 09:48AM

4 Q. Okay. So during your times teaching in a 09:48AM
5 special education leads, you never -- am I correct that 09:48AM
6 you did not have a student attend GNETS? 09:48AM

7 A. I did not have a student attend GNETS. 09:48AM

8 Q. Okay. Thank you. I'm interested in learning 09:48AM
9 more about your role as a GNETS program specialist? 09:48AM

10 A. Mm-hmm. 09:48AM

11 Q. Why did you choose to apply in July 2018? 09:48AM

12 A. I've always worked with students that had 09:48AM
13 emotional behavioral disorders. 09:48AM

14 Q. Okay. 09:48AM

15 A. So that was one of the reasons I applied for 09:48AM
16 the job. I was also -- I've always also been interested 09:49AM
17 in learning more -- I wouldn't say learning more, I 09:49AM
18 would just say because of my work, my previous work with 09:49AM
19 students with emotional behavioral disorders. 09:49AM

20 Q. Okay. Thank you. 09:49AM

21 MS. TUCKER: I'd like the Court Reporter to 09:49AM
22 mark this document as Plaintiff's Exhibit 420. 09:49AM

23 (Plaintiff's Exhibit 420 marked for 09:50AM
24 identification.) 09:50AM

25 Q. BY MS. TUCKER: I'll wait until you get it. 09:50AM

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1 Okay. The Bates number on the first page of this
2 exhibit is GA00119322. This is a July 2018 e-mail
3 thread, including Crystal Albright, Karen Flowers,
4 Zelfphine Smith-Dixon, Vickie Cleveland, and Shanita
5 Howard. The most recent e-mail in the thread is dated
6 July 29th, 2018, with a subject of "Permission to post
7 new position GNETS." There's one attachment.

8 A. (Witness examining document.)

9 Q. Dr. Stevenson, please take a look at the
10 attachment beginning at GA00119324. The top reads that
11 it's a posting for job 18-77 GNETS program specialist.

12 A. (Witness examining document.)

13 Q. Do you recognize this as the job posting that
14 you applied for?

15 A. Yes.

16 Q. Okay. Let's turn back to that cover e-mail.
17 Who is Crystal Albright?

18 A. I don't know.

19 Q. Okay. Who is Karen Flowers?

20 A. I think she was a budget analyst.

21 Q. Okay. Who is Shanita Howard?

22 A. I don't know.

23 Q. Okay. And then who is Zelfphine Smith-Dixon?

24 A. She is the former Special Education director
25 for the State of Georgia.

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1 GNETS program needed additional people?

09:53AM

2 A. Mm-hmm.

09:53AM

3 Q. Is that a yes?

09:53AM

4 A. Yes.

09:53AM

5 Q. Okay. Great. What -- were they saying
6 anything else about the job?

09:53AM

7 A. No.

09:53AM

8 Q. Okay. Let's take a look at the box with the
9 two paragraphs towards the top. The box starts with
10 "Provides general supervision."

09:53AM

11 A. Mm-hmm.

09:53AM

12 Q. Do you see that?

09:53AM

13 A. Yes.

09:53AM

14 Q. Okay. I want you to take a look at the
15 description. And would you agree that this box
16 describes the duties of the GNETS program specialist?

09:53AM

17 A. (Witness examining document.) Yes.

09:53AM

18 Q. Okay. Thank you, Dr. Stevenson. Let's look at
19 this a little bit more. Where the post -- do you see
20 where the posting reads: "Provides general supervision
21 for the Georgia Network for Educational and Therapeutic
22 Support, GNETS"?

09:54AM

23 A. Yes.

09:54AM

24 Q. As GNETS program specialist, in what ways do
25 you provide general supervision for GNETS?

09:54AM

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1 A. I provide general supervision for GNETS by 09:54AM
2 answering any questions that the directors may have in 09:54AM
3 regards to the strategic plan or the grand application 09:54AM
4 or i-Ready, Basc, or any of the programs that -- that 09:54AM
5 they use. 09:54AM

6 Q. Okay. So you answer questions? 09:55AM

7 A. Mm-hmm. 09:55AM

8 Q. What other ways do you provide supervision? 09:55AM

9 A. By reviewing grant applications and the 09:55AM
10 strategic plan. 09:55AM

11 Q. Okay. Next, do you see where it reads: 09:55AM
12 "Duties include collaborating with the Georgia 09:55AM
13 Department of Education GaDOE team by building 09:55AM
14 professional learning structures"? 09:55AM

15 A. Mm-hmm. 09:55AM

16 Q. Okay. As GNETS program specialist, in what 09:55AM
17 ways do you build professional learning structures? 09:55AM

18 A. We collaborate with -- for example, we 09:55AM
19 collaborate -- collaborated with Georgia State for the 09:55AM
20 FBA/BIP training. 09:55AM

21 Q. Yes? 09:55AM

22 A. We also did a collaboration with Georgia State 09:55AM
23 for trauma-informed care. 09:55AM

24 Q. Okay. 09:55AM

25 A. We will also collaborate with colleagues within 09:55AM

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1 A. -- maybe.

09:57AM

2 Q. Okay. Do you see where it reads: "Duties
3 include providing technical assistance with strategic
4 planning and implementation activities --

09:57AM

09:57AM

09:57AM

5 A. Mm-hmm.

09:57AM

6 Q. -- including presentation materials and
7 mechanisms to ensure common standards of practice across
8 the GNETS network are followed with fidelity"?

09:57AM

09:57AM

09:57AM

9 A. Yes.

09:57AM

10 Q. Okay. As GNETS program specialist, in what
11 ways do you ensure common standards of practice across
12 GNETS are followed with fidelity?

09:57AM

09:57AM

09:57AM

13 A. By reviewing the strategic plan.

09:57AM

14 Q. What kind of common standards are there?

09:57AM

15 MS. JOHNSON: Objection.

09:57AM

16 THE WITNESS: Whatever is within the
17 strategic plan.

09:57AM

09:57AM

18 Q. BY MS. TUCKER: Okay. And we'll take a look at
19 the strategic plan later.

09:57AM

09:58AM

20 So do you agree that there are common
21 standards of practice across the GNETS network?

09:58AM

09:58AM

22 MS. JOHNSON: Objection.

09:58AM

23 THE WITNESS: There -- there are things
24 within the strategic plan that all the GNETS are aware
25 of.

09:58AM

09:58AM

09:58AM

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1 A. I would have to sit and think about that. 10:02AM

2 Q. Okay. And I'm correct, I believe, that you 10:02AM
3 assumed this job in 20 -- October 2018. Does that sound 10:02AM
4 right? 10:02AM

5 A. Yes. 10:02AM

6 Q. Okay. Were you notified prior to October 2018 10:02AM
7 that you would be in this position? 10:02AM

8 A. No. 10:02AM

9 Q. Okay. 10:02AM

10 MS. TUCKER: I'd like the Court Reporter to 10:03AM
11 mark this document as Plaintiff's Exhibit 421. 10:03AM

12 (Plaintiff's Exhibit 421 marked for 10:03AM
13 identification.) 10:03AM

14 MS. TUCKER: Great. Thank you. 10:03AM

15 Q. BY MS. TUCKER: The Bates number on the first 10:03AM
16 page of this exhibit is GA00953298. 10:03AM

17 A. (Witness examining document.) 10:03AM

18 Q. This is an October 29th, 2019 e-mail from 10:03AM
19 Vickie Cleveland to you. The subject reads: 10:03AM
20 "Responsibilities." And there's one attachment. 10:03AM

21 Dr. Stevenson, do you recognize this e-mail 10:04AM
22 and attachment? 10:04AM

23 A. Yes. 10:04AM

24 Q. Okay. Let's turn to the attachment with -- at 10:04AM
25 the bottom. The Bates number reads GA00953299. The top 10:04AM

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1	of the document reads: "GNETS program specialist	10:04AM
2	responsibilities." And there's a box with bulleted	10:04AM
3	responsibilities.	10:04AM
4	Dr. Stevenson, did you create this	10:04AM
5	document?	10:04AM
6	A. I don't think so.	10:04AM
7	Q. Okay. Would you think that Vickie created it	10:04AM
8	since she sent it to you?	10:04AM
9	MS. JOHNSON: Objection.	10:05AM
10	THE WITNESS: I'm not sure. She -- she	10:05AM
11	sent it to me based on what this says, but I'm not sure	10:05AM
12	if she created it.	10:05AM
13	Q. BY MS. TUCKER: Okay. But you did receive this	10:05AM
14	from Vickie Cleveland?	10:05AM
15	A. That's what the e-mail says.	10:05AM
16	Q. And these are e-mails we received from the	10:05AM
17	State.	10:05AM
18	A. Okay.	10:05AM
19	Q. Okay. I'd love for you to take a look at the	10:05AM
20	document and responsibilities. And then would you agree	10:05AM
21	that it identifies your responsibilities as GNETS	10:05AM
22	program specialist?	10:05AM
23	A. Yes.	10:05AM
24	Q. Okay. It's quite a long list. I know you're	10:05AM
25	busy, but I'd like to go through them. Starting with	10:05AM

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1 the first bullet. "Provide consultation regarding
2 improvement on the GNETS strategic plan."

3 So you've mentioned the GNETS strategic
4 plan a few times. What is it?

5 A. It's a framework for the GNETS programs.

6 Q. Okay. All 24 regional programs?

7 A. Yes.

8 Q. Okay. In what ways do you provide consultation
9 regarding improvement on the GNETS strategic plan?

10 A. We always take a look at the strategic plan to
11 see what can be consolidated, if something is
12 repetitive, and just make changes as needed. If there
13 are any questions regarding any changes that were made
14 or when we do changes, if there's a training or a
15 presentation that needs to be completed, then I'll do
16 that.

17 Q. Okay. What type of changes would be made?

18 A. It just depends. We've made a few, so...

19 Q. Can you give me an example?

20 A. For example, we consolidated. It was seven
21 focused areas and we consolidated them into six, because
22 two of them had a lot of the same information.

23 Q. Okay. Got it. And do you also provide
24 consultation regarding improvement to the programs?

25 A. I don't provide consultation regarding

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1 improvement to the specific programs, no.

10:07AM

2 Q. Okay. And then do you see how this bullet --
3 there's a few that are somewhat highlighted.

10:07AM

10:07AM

4 A. Yes.

10:07AM

5 Q. Do you see that?

10:07AM

6 A. (Nodding yes.)

10:07AM

7 Q. Do you know why this bullet is highlighted?

10:07AM

8 A. I do not.

10:07AM

9 Q. Next bullet: "Complete GNETS end-of-year
10 reviews, provide ratings and feedback."

10:07AM

10:07AM

11 A. Yes.

10:07AM

12 Q. What are GNETS end-of-year reviews?

10:07AM

13 A. So the end-of-year reviews are the strategic
14 plan reviews.

10:07AM

10:07AM

15 Q. Okay. And this is for the original GNETS
16 programs?

10:07AM

10:07AM

17 A. Correct.

10:07AM

18 Q. Okay. Why is this bullet highlighted?

10:07AM

19 A. I have no idea.

10:07AM

20 Q. Okay. So how do you provide ratings?

10:07AM

21 A. Previously, we would go through each part of
22 the strategic plan, face-to-face with the GNETS -- each
23 of the GNETS directors, and they would provide evidence
24 of their ratings and then we would provide feedback.

10:07AM

10:08AM

10:08AM

10:08AM

25 Q. What basis did you --

10:08AM

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1	A. There was a rubric.	10:08AM
2	Q. There was a rubric. Okay. And is this how you	10:08AM
3	still -- you mentioned that this is not how you do it	10:08AM
4	anymore?	10:08AM
5	A. We no longer provide a specific rating.	10:08AM
6	Q. When did that change?	10:08AM
7	A. I would have to think about it honestly.	10:08AM
8	Q. Okay. Do you think it was in the last two	10:08AM
9	years?	10:08AM
10	A. It was before COVID.	10:08AM
11	Q. Before COVID. Okay. So 2020 and prior?	10:08AM
12	A. Somewhere around there.	10:08AM
13	Q. Okay.	10:08AM
14	A. 2019, maybe 2020.	10:08AM
15	Q. Okay. Do you have a rubric still?	10:08AM
16	A. It's still a rubric, yeah.	10:08AM
17	Q. Okay. So if they're not ratings, what are	10:08AM
18	you --	10:08AM
19	A. It's not a numerical rating.	10:08AM
20	Q. Okay.	10:08AM
21	A. It's operational evident, not evident.	10:09AM
22	Q. So still a score?	10:09AM
23	A. It's not necessarily a score, but...	10:09AM
24	Q. What would you describe them as?	10:09AM
25	A. If it was a number, I would say it was a score.	10:09AM

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1 Q. Sure.

10:09AM

2 A. We can say rating.

10:09AM

3 Q. Rating. Okay.

10:09AM

4 A. Yeah. Non-numerical.

10:09AM

5 Q. A non-numerical rating?

10:09AM

6 A. Yes.

10:09AM

7 Q. Is this done in conjunction with anyone else at
8 GaDOE?

10:09AM

10:09AM

9 A. No.

10:09AM

10 Q. So you work on these ratings alone?

10:09AM

11 A. Vickie, myself, the directors are there, but no
12 one outside of myself and Vickie from GaDOE.

10:09AM

10:09AM

13 Q. Okay. Does anyone else in GaDOE see the
14 ratings?

10:09AM

10:09AM

15 A. No.

10:09AM

16 Q. Okay. Does anyone else see the feedback?

10:09AM

17 A. No.

10:09AM

18 Q. Okay. Let's move on to the next bullet.

10:09AM

19 "Assist GNETS PM with strategic plan improvement
20 initiatives." And then in parenthesis it reads:

10:09AM

10:09AM

21 "Editing, testing changes in the portal, conduct
22 trainings, et cetera."

10:10AM

10:10AM

23 A. Yes.

10:10AM

24 Q. Okay. The GNETS PM is Vickie; is that correct?

10:10AM

25 A. Correct.

10:10AM

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1 Q. They're aware of their own data? 10:31AM

2 A. Mm-hmm. 10:31AM

3 Q. But you also reach out? 10:31AM

4 A. On occasion. 10:31AM

5 Q. Okay. Do you reach out if it's stagnant growth 10:31AM

6 as well? 10:32AM

7 A. I would have to think about that. 10:32AM

8 Q. Okay. Let's move to the next bullet: "Monitor 10:32AM

9 social worker logs, provide updates to the GNETS PM." 10:32AM

10 Can you tell me more about this bullet? 10:32AM

11 A. There are 11 programs that receive a 10:32AM

12 therapeutic grant for a social worker, and they're 10:32AM

13 required or they are asked to submit social worker logs 10:32AM

14 monthly. 10:32AM

15 Q. This therapeutic grant, is it through GaDOE? 10:32AM

16 A. Yes. 10:32AM

17 Q. And 11 of the 24 programs receive it? 10:32AM

18 A. Yes. 10:32AM

19 Q. How do they share this information with you? 10:32AM

20 A. Through the portal. 10:32AM

21 Q. Do you share -- what would you share as updates 10:33AM

22 with Vickie Cleveland? 10:33AM

23 A. The programs that haven't submitted their logs, 10:33AM

24 and I do a summary at the end of the year. 10:33AM

25 Q. Okay. For all 11? 10:33AM

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1 "Collaborate with GO-IEP team on pending changes in the
2 portal."

3 A. Yes.

4 Q. I know earlier you mentioned GO-IEP, but can
5 you explain it to me?

6 A. Georgia IEP is a statewide IEP program.

7 Q. Is Georgia IEP the same as GO-IEP?

8 A. It is.

9 Q. Okay. And how do you collaborate with the
10 GO-IEP team?

11 A. As they make updates specific to GNETS, they'll
12 reach out.

13 Q. The next one: "Co-facilitate GNETS directors
14 meetings."

15 A. Yes.

16 Q. All right. In this bullet it identifies those
17 meetings with regional GNETS program directors?

18 A. Correct.

19 Q. How often?

20 A. Usually monthly, if not every other month.

21 Q. Who do you co-facilitate with?

22 A. I co-facilitate with Vickie Cleveland.

23 Q. Who sets the agenda?

24 A. Vickie Cleveland.

25 Q. Do you discuss that with her in advance?

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1 A. Yes.

10:35AM

2 Q. And then are these meetings in-person?

10:35AM

3 A. Virtual, since COVID.

10:35AM

4 Q. In the past, have they been in-person?

10:35AM

5 A. They have been, yes.

10:35AM

6 Q. And what is --

10:35AM

7 A. We did both.

10:35AM

8 Q. I apologize.

10:35AM

9 A. Both virtual and in-person, even before COVID.

10:35AM

10 Q. Okay. Does that mean that some people are
11 in-person and some people are virtual?

10:35AM

10:35AM

12 A. No. Sometimes we'll have all in-person and
13 sometimes we would have all virtual, but that was
14 pre-COVID.

10:35AM

10:36AM

10:36AM

15 Q. Got it. So you were Zooming before -- before
16 we all were?

10:36AM

10:36AM

17 A. Yes.

10:36AM

18 Q. What is your role during these meetings?

10:36AM

19 A. To do the PowerPoint.

10:36AM

20 Q. Is the PowerPoint -- what is the PowerPoint for
21 the meetings, is it the agenda or is it a different
22 topic?

10:36AM

10:36AM

10:36AM

23 A. There are different presentations, different
24 presenters every month. And so if they have a
25 PowerPoint, I'll combine the PowerPoints and just do the

10:36AM

10:36AM

10:36AM

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1 presentation, and then just provide reminders of 10:36AM
2 anything that might need to be reminded about. 10:36AM

3 Q. Okay. "Advice GNETS staff and stakeholders on 10:36AM
4 State Board rules for GNETS." 10:36AM

5 A. Mm-hmm. 10:36AM

6 Q. Do you recall what State Board rules this 10:36AM
7 bullet is referring to? 10:36AM

8 A. The GNETS State Board rules. 10:35AM

9 Q. And then this -- it looks like this bullet is 10:37AM
10 plural. Is there another -- oh, no, it's State Board 10:37AM
11 rule. It's singular. I apologize. 10:37AM

12 Which GNETS staff do you advise on the 10:37AM
13 State Board rule? 10:37AM

14 A. I mean, we'll -- we might have the State Board 10:37AM
15 rule as a part of the presentation, so that's as much 10:37AM
16 advising as I would say for me. 10:37AM

17 Q. And the presentation is to the GNETS directors? 10:37AM

18 A. Yes. 10:37AM

19 Q. Do you ever present to other folks at regional 10:37AM
20 GNETS programs? 10:37AM

21 A. Other folks like who? 10:37AM

22 Q. Teachers -- 10:37AM

23 A. No. I never interact with the teachers. 10:37AM

24 Q. And what do you-all advise related to State 10:37AM
25 Board rules and the presentation? 10:37AM

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1 A. I mean, it's not a conversation that's had
2 everyday or every month.

3 Q. Sure.

4 A. So as things come up and they need to be done,
5 if I'm asked to do them as a part of my job, I do.

6 Q. Do you currently work on any matters not
7 related to GNETS?

8 A. No.

9 Q. Do you know if anyone held the role of GNETS
10 program specialist before you?

11 A. I do not.

12 Q. You don't -- do you not know?

13 A. I don't know.

14 Q. Okay. Who have you worked with at the GaDOE,
15 while GNETS program specialist, in addition to Vickie
16 Cleveland?

17 A. Worked with in what way?

18 Q. Have you coordinated or collaborated with in
19 your work?

20 A. I've collaborated with a lot of people.

21 Q. A lot of people?

22 A. (Nodding yes.)

23 Q. Okay. I'm going to go through a few folks
24 then.

25 A. (Nodding yes.)

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1 Q. To be aware?

11:24AM

2 A. (Nodding yes.)

11:24AM

3 Q. So am I correct that GNETS students are served
4 in centers and school-based locations?

11:24AM

5 A. Yes.

11:24AM

6 Q. Do you know how many centers are being used
7 this school year?

11:24AM

11:24AM

8 A. I do not.

11:24AM

9 Q. Do you know how many centers were used last
10 school year?

11:24AM

11:24AM

11 A. I do not.

11:24AM

12 Q. Is this information that you would typically
13 have?

11:24AM

11:24AM

14 MS. JOHNSON: Objection.

11:24AM

15 THE WITNESS: Have like what?

11:24AM

16 Q. BY MS. TUCKER: Is this information that you
17 would typically know about the GNETS program, how many
18 centers there are --

11:24AM

11:24AM

11:24AM

19 MS. JOHNSON: Objection.

11:24AM

20 Q. BY MS. TUCKER: -- as GNETS program specialist?

11:24AM

21 A. That information is reported -- self-reported
22 by the GNETS directors in the grant application.

11:24AM

11:25AM

23 Q. Do you then take a look and --

11:25AM

24 A. I mean, if they put it in there as a part of my
25 review for the GrantApp, then I would look at it, but I

11:25AM

11:25AM

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1 easier to be electronic. That's the answer. 11:50AM

2 Q. I understand. Okay. 11:50AM

3 MS. TUCKER: Okay. I'd like the Court 11:50AM
4 Reporter to mark this document as Plaintiff's 11:50AM
5 Exhibit 423. 11:51AM

6 (Plaintiff's Exhibit 423 marked for 11:51AM
7 identification.) 11:51AM

8 MS. TUCKER: Actually, can we also go off 11:51AM
9 the record for one moment? 11:51AM

10 THE VIDEOGRAPHER: Yes. Stand by. 11:51AM

11 MS. TUCKER: Thank you. 11:51AM

12 THE VIDEOGRAPHER: Off the record at 11:51AM
13 11:52 a.m. 11:51AM

14 (Off the record.) 11:52AM

15 THE VIDEOGRAPHER: We are back on the 11:52AM
16 record at 11:54 a.m. 11:53AM

17 Q. BY MS. TUCKER: The Court Reporter just handed 11:53AM
18 you a document that was marked as Plaintiff's 11:53AM
19 Exhibit 423. The Bates number on the first page of this 11:53AM
20 exhibit is GA00953689. The most recent date on the 11:53AM
21 e-mail thread is November 18th, 2019, and it is an 11:53AM
22 e-mail from you -- 11:53AM

23 A. Mm-hmm. 11:53AM

24 Q. -- to the regional GNETS program directors, and 11:53AM
25 Vickie Cleveland is copied. The subject reads: 11:53AM

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1 "GrantApp PP." And will there is one attachment. 11:53AM

2 A. (Witness examining document.) 11:53AM

3 Q. Dr. Stevenson, do you recognize this e-mail 11:53AM
4 thread? 11:53AM

5 A. Yes. 11:53AM

6 Q. Okay. Am I correct that you presented to the 11:53AM
7 regional GNETS program directors on the GNETS grant 11:53AM
8 application? 11:53AM

9 A. Yes. 11:53AM

10 Q. And then the attachment which begins with 11:53AM
11 GA00953691 and then that says it's produced in native 11:53AM
12 format, which we then presented for PowerPoint. Do you 11:54AM
13 see that? 11:54AM

14 A. Yes. 11:54AM

15 Q. Is this the PowerPoint presentation you used? 11:54AM

16 A. Yes. 11:54AM

17 Q. Okay. Did you create this PowerPoint? 11:54AM

18 A. Yes. 11:54AM

19 Q. Is it still current? 11:54AM

20 A. (Witness examining document.) To the best of 11:54AM
21 my knowledge, without taking a lot of time, yes. 11:55AM

22 Q. Okay. And then given earlier you said that 11:55AM
23 there hasn't been any substantive changes to the 11:55AM
24 application, so this -- correct? 11:55AM

25 A. I'm thinking yes. 11:55AM

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1 Q. How often do you give this training? 11:55AM

2 A. There hasn't been any changes to the way the 11:55AM
3 information is entered into the portal. So I have not 11:55AM
4 had to train on how to enter the information into the 11:55AM
5 portal again because that has not changed. 11:55AM

6 Q. And that's what this -- 11:55AM

7 A. This was once we switch from paper to 11:55AM
8 electronic. 11:56AM

9 Q. Mm-hmm. 11:56AM

10 A. This is showing the directors what it looks 11:56AM
11 like. So I went through each individual page and showed 11:56AM
12 them what it looked like in real time and then created 11:56AM
13 this as a resource. 11:56AM

14 Q. But it's not an annual training before the 11:56AM
15 grant application is due? 11:56AM

16 A. No. Unless there's a new director who needs to 11:56AM
17 know how to put the information in. 11:56AM

18 Q. Would that end up being like a one on one? 11:56AM

19 A. That would be a one on one. 11:56AM

20 Q. And you have presented to the GNETS program 11:56AM
21 directors on this? 11:56AM

22 A. Yes. 11:56AM

23 Q. Okay. Can you walk me through the timeline of 11:56AM
24 submitting the GNETS grant application, like, when does 11:56AM
25 the application open? 11:56AM

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1 A. So that information has changed, but how the
2 information is entered has not.

3 Q. Okay. So when is it opened now?

4 A. Now, in January.

5 Q. Okay. When did it used to be open?

6 A. I would have to think about that.

7 Q. Okay.

8 A. I know now it's January, though.

9 Q. When did it change to January?

10 A. Maybe in the last two years.

11 Q. The last two years. Okay. So it opens in
12 January, and if I was original GNETS program I would
13 apply in January for the school year that begins in
14 August; is that correct?

15 A. Yes. I think. It's for the fiscal year. So
16 if we're in FY '22, it would be for FY '23. So if we're
17 in FY '23, it would be for FY '24. So the up -- the
18 next fiscal year.

19 Q. Okay.

20 A. So in FY -- fiscal year '22, they apply for
21 fiscal year '23. Now we're in fiscal year '23, and they
22 would apply for fiscal year '24.

23 Q. When does the fiscal year start and end for
24 you-all?

25 A. I believe it's in June -- June or July.

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1 Q. June or July. Okay. So if applied in 11:58AM
2 January -- if I was a regional GNETS director and I 11:58AM
3 applied for the grants in January of 2022, it was for 11:58AM
4 fiscal year '23? 11:58AM
5 A. It's not due until May. 11:58AM
6 Q. Okay. 11:58AM
7 A. So it's opened in January, but they have until 11:58AM
8 May to complete it. 11:58AM
9 Q. Okay. And it's submitted through the portal? 11:58AM
10 A. Yes. 11:58AM
11 Q. So once it's submitted in May, when it 11:58AM
12 closes -- 11:58AM
13 A. Mm-hmm. 11:58AM
14 Q. -- how long is the review process of the 11:58AM
15 application? 11:58AM
16 A. Well, it just depends because we have to go 11:58AM
17 through each one and look at the attachment, so it just 11:58AM
18 depends on how long it takes us to finish all of that. 11:58AM
19 Q. Do you have a deadline to meet to make sure you 11:58AM
20 get it done in time for the next step? 11:58AM
21 A. We have -- we try to have them done within a 11:59AM
22 month. 11:59AM
23 Q. Within a month. So May. And then you have 11:59AM
24 like a month? 11:59AM
25 A. Yeah. 11:59AM

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1 Q. Okay. Who reviews? 11:59AM

2 A. Myself and Vickie. 11:59AM

3 Q. Do you review them all together? 11:59AM

4 A. We'll review them separately. We'll split the 11:59AM
5 list, 12 and 12, and then Vickie would always, you know, 11:59AM
6 look at mine also. 11:59AM

7 Q. Do you-all meet to discuss them? 11:59AM

8 A. Yes. 11:59AM

9 Q. Do you discuss her 12 as well? 11:59AM

10 A. Sometimes. 11:59AM

11 Q. What would you discuss within the grant 11:59AM
12 application with Vickie? 11:59AM

13 A. If someone didn't submit an attachment, or if 11:59AM
14 someone was having technical issues and they reached out 12:00PM
15 to me and I needed to reach out to IT, I might -- if I 12:00PM
16 had a question about something, she might answer it. So 12:00PM
17 it just depends. 12:00PM

18 Q. Okay. When are the regional GNETS programs 12:00PM
19 advised that their grant application has been approved? 12:00PM

20 A. So this year we are meeting with them 12:00PM
21 individually, and that's -- that started this year. So 12:00PM
22 we meet to discuss their GrantApp, and if any additional 12:00PM
23 documentation is needed. 12:00PM

24 Q. Okay. Just to make sure I understand, so in 12:00PM
25 May, once you receive them, you-all discuss, and then 12:00PM

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1 this summer you then met with the regional GNETS

12:00PM

2 programs about their application?

12:00PM

3 A. If there is something else that's needed.

12:00PM

4 Q. So would you meet with all 24 on this or just
5 if they need something?

12:00PM

12:01PM

6 A. And when we meet it's not necessarily -- well,
7 yeah. It could be if just something is needed or it
8 could be just a touch base like, hey, we got your
9 information and printout.

12:01PM

12:01PM

12:01PM

12:01PM

10 Q. Okay. And you started that in 2022?

12:01PM

11 A. Yes.

12:01PM

12 Q. But when -- so, I'm sorry. Let's go back.

12:01PM

13 When do they receive notice that they have funding?

12:01PM

14 A. So once we -- once we do the sign off, they get
15 a notification that the GrantApp has been signed off.

12:01PM

12:01PM

16 Q. And does that have to be before the beginning
17 of the fiscal year?

12:01PM

12:01PM

18 A. Within the best of our abilities.

12:01PM

19 Q. Does that mean it doesn't always happen?

12:02PM

20 A. 99 percent of the time it does.

12:02PM

21 Q. Are you thinking about a program that didn't --

12:02PM

22 A. It's not necessarily they didn't submit it,
23 they might just need to have some more information and
24 so you have to keep going back and forth, and then it's
25 summer and they're out and then they come back, so it

12:02PM

12:02PM

12:02PM

12:02PM

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1 just depends.

12:02PM

2 Q. When do they receive the funding from the
3 grant?

12:02PM

12:02PM

4 A. That, I don't know.

12:02PM

5 Q. Who would know?

12:02PM

6 A. Vickie.

12:02PM

7 Q. Do the regional GNETS programs answer different
8 questions on the grant applications, are there any
9 questions that are tailored?

12:02PM

12:02PM

12:02PM

10 A. No. They're all the same.

12:02PM

11 Q. Okay. So like North Metro has to provide the
12 exact same information that you and Alexander has to
13 provide?

12:02PM

12:02PM

12:02PM

14 A. Correct. Now how they provide it, is
15 different, because it's different for every program
16 because -- but there are certain things they all have to
17 provide.

12:02PM

12:02PM

12:02PM

12:02PM

18 Q. In addition to presenting on the portal and how
19 to access the application and reviewing the applications
20 with Vickie, what other roles do you have related to the
21 GNETS grant application?

12:03PM

12:03PM

12:03PM

12:03PM

22 A. That's it.

12:03PM

23 Q. Do you review them prior to submission in the
24 portal?

12:03PM

12:03PM

25 A. Well, as they're entering them, we can see it,

12:03PM

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1	Q. What -- which of your responsibilities would	12:09PM
2	allow you to do that?	12:09PM
3	A. Whatever Vickie asks me to do.	12:09PM
4	Q. Can you give --	12:09PM
5	A. It just depends.	12:09PM
6	Q. Can you give me an example?	12:09PM
7	A. I would have to think about that.	12:09PM
8	Q. Okay. We can also give you time right now or	12:09PM
9	we can come back to it later.	12:10PM
10	A. We can come back to it. That would give me a	12:10PM
11	little bit more time.	12:10PM
12	Q. Okay. I'll make a note.	12:10PM
13	I see that you called or you spoke with	12:10PM
14	Derrick. Does that mean you called Derrick?	12:10PM
15	A. Yes.	12:10PM
16	Q. Are most of these types of conversations done	12:10PM
17	via phone call or are they ever e-mailed?	12:10PM
18	A. Phone call for clarity.	12:10PM
19	Q. Can you do -- can you share it through the	12:10PM
20	portal?	12:10PM
21	A. Share -- no.	12:10PM
22	Q. Okay.	12:10PM
23	A. We can e-mail but --	12:10PM
24	Q. Okay.	12:10PM
25	A. -- for clarity, it's best to call.	12:10PM

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1 strategic plan, and your consultation with the regional
2 GNETS programs on the strategic plan.

3 A. Okay.

4 Q. What is the timeline of strategic review plan?
5 We just talked about the grant application timeline?
6 What is this timeline?

7 A. Well, we no longer review the strategic plan in
8 a way in which there is a timeline because we've made
9 changes. So the grant application and strategic plan
10 are now aligned. So the information that we would look
11 for in the strategic plan, they are attaching within the
12 grant application. So there is not a review as it was
13 in previous years. They do the end-of-year summary from
14 the strategic plan and the mid-year summary where they
15 rate themselves and make priorities for the different
16 areas, but we no longer go and sit and do reviews as in
17 the past.

18 Q. When did that happen?

19 A. This is 2022. It was either 2020 or 2021. I'm
20 not sure.

21 Q. So what is the strategic review plan? What
22 does it look like now, then?

23 A. It looks the same. It's still the framework.
24 It's still the framework for the program and the
25 framework for their programs. And it still has actions

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1 and things, but we're just not rating and reviewing the 12:41PM
2 strategic plan because now they're aligned -- it's 12:41PM
3 aligned with the GrantApp. So if you look at the grant 12:41PM
4 application and the strategic plan, you will see a lot 12:41PM
5 of the same information. 12:41PM

6 Q. But they still complete it in both places? 12:41PM

7 A. No, they no longer have to complete the grant 12:41PM
8 application in the portal. I mean, I'm sorry, the 12:41PM
9 strategic plan. They still have to complete the grant 12:41PM
10 application. 12:41PM

11 Q. Okay. So the strategic plan in 2020 or 2021 no 12:41PM
12 longer has to be completed? 12:42PM

13 A. In the portal. 12:42PM

14 Q. In the portal. 12:42PM

15 A. They still have to have their strategic plan 12:42PM
16 information as a part of the framework for their 12:42PM
17 programs available, but we no longer require it to be 12:42PM
18 upload -- uploaded in the portal. 12:42PM

19 Q. Why is that? What made the change? 12:42PM

20 A. To streamline the process when a lot of the 12:42PM
21 information aligns with information that is requested 12:42PM
22 within the grant application. 12:42PM

23 Q. Okay. And then how do you receive the 12:42PM
24 strategic plan from the programs if it's not in the 12:42PM
25 portal? 12:42PM

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1 A. We do not receive the strategic plan. We
2 receive the summary.

3 Q. Uh-huh.

4 A. Mid-year and end-year summary. It's a one
5 pager.

6 Q. Mm-hmm.

7 A. And it is uploaded within the grant
8 application.

9 Q. Are you -- earlier when we spoke about the
10 strategic plan, I believe you said that there were
11 ratings of emerging, operational, and evident?

12 A. When we used to review the strategic plan and
13 go out and do the reviews and it was uploaded in the
14 portal, yes.

15 Q. And now when you receive the mid-year summary
16 and end-of-year summary?

17 A. They're rating themselves.

18 Q. And does GaDOE provide --

19 A. No.

20 Q. -- a rating?

21 A. No.

22 Q. And this happened in the last two years?

23 A. Mm-hmm.

24 Q. Do you -- does GaDOE provide any feedback
25 related to the mid-year summary or end of the year

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1 Q. Okay. Were these ratings tied to anything? 12:53PM

2 A. No. 12:53PM

3 Q. What would have happened if someone -- a 12:53PM

4 regional program had all emergings and not evident? 12:53PM

5 MS. JOHNSON: Objection. 12:53PM

6 THE WITNESS: I can't say because I've 12:53PM

7 never had that happen. 12:53PM

8 Q. BY MS. TUCKER: You never had that -- 12:53PM

9 A. Since I've been with the program. 12:53PM

10 Q. And you've been with the program the entire 12:53PM

11 time it's had the operational, emerging, and not evident 12:53PM

12 because before it was numerical? 12:53PM

13 A. Right. 12:53PM

14 Q. Do you and Vickie have conversations with the 12:54PM

15 regional GNETS program -- I know you said they're 12:54PM

16 uploaded into the portal, but afterwards about their 12:54PM

17 scores, ratings? 12:54PM

18 A. A lot of times a conversation was happening 12:54PM

19 within the review so -- 12:54PM

20 Q. Okay. 12:54PM

21 A. So there wasn't a lot of follow up needed. 12:54PM

22 MS. TUCKER: I'd like the Court Reporter to 12:54PM

23 mark this document as Plaintiff's Exhibit 427. 12:54PM

24 (Plaintiff's Exhibit 427 marked for 12:54PM

25 identification.) 12:54PM

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1 Q. BY MS. TUCKER: The Bates number on the first 12:54PM
2 page of the document is GA00960449. This is a 12:54PM
3 September 9th, 2020, e-mail from you to two e-mail 12:55PM
4 addresses with the domain at tcjackets.net, and Shawn 12:55PM
5 Owen and Vickie Cleveland and you were copied. 12:55PM

6 A. (Witness examining document.) 12:55PM

7 Q. The subject reads: "State suggested revision 12:55PM
8 on action items for Pathways Educational Program GNETS 12:55PM
9 strategic plan." 12:55PM

10 Dr. Stevenson, do you recognize this 12:55PM
11 e-mail? 12:55PM

12 A. This is a generated e-mail. It's not one I 12:55PM
13 typed. 12:55PM

14 Q. Oh. Can you explain that to me? 12:55PM

15 A. So in the portal, this is in 2020, so this was 12:55PM
16 a virtual review that took place cause by September, 12:55PM
17 that was COVID. 12:55PM

18 Q. Okay. 12:55PM

19 A. And the reviews were virtual. So once the 12:55PM
20 information is put in and I hit submit, she needed a 12:55PM
21 revision, and it automatically sends it. So it's not 12:55PM
22 something that -- it's not an e-mail I typed myself. 12:55PM

23 Q. I understand. So this happens when you put it 12:56PM
24 in other -- for other regional GNETS programs too? 12:56PM

25 A. So if they needed a revision on their strategic 12:56PM

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1 plan, it would say what section, what action item and
2 the finding.

3 Q. Okay.

4 A. But I didn't type the e-mail, no. It's auto
5 generated.

6 Q. Sure. Would the finding where it says "Section
7 action item finding,"-- excuse me, would you have typed
8 what's in after the finding into the portal and that
9 would have then --

10 A. Yes. I just --

11 Q. -- been --

12 A. Yeah, that's it.

13 Q. Okay. So you, for example, for Section 2,
14 behavioral support and therapeutic services, your
15 finding was, and you wrote upload PBIS agendas, and
16 upload evidence of how red areas and self-assessments
17 were addressed?

18 A. Yes.

19 Q. Okay. What is meant by red areas?

20 A. So that means that the red area -- so the
21 self-assessment that I was talking about at the end of
22 the strategic plan review, if her areas were marked red,
23 they were areas of need, so how were you -- how was she
24 going to address those.

25 Q. And that would ultimately affect their rating?

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1 A. Well, I'm not sure if I gave them a rating if 12:57PM
2 they hadn't completely uploaded everything yet. 12:57PM

3 Q. I see Shawn Owen is copied. 12:57PM

4 A. Shawn is always copied on all auto-generated 12:57PM
5 because she's the deputy. 12:57PM

6 Q. Okay. 12:57PM

7 A. Anything that comes out of the portal to the -- 12:57PM
8 to any -- not just with GNETS, with anybody. 12:57PM

9 Q. So she's getting lots of e-mails? 12:57PM

10 A. Yes. 12:57PM

11 Q. Have you or Vickie ever discussed any 12:57PM
12 feedbacks -- feedback related to the GNETS strategic 12:57PM
13 plan with Shawn Owen? 12:57PM

14 A. Not that I can recall. Not that I've been 12:57PM
15 involved. 12:57PM

16 Q. Okay. And then what -- the domain was at 12:57PM
17 tcjackets.net. Do you know who this was sent to? 12:57PM

18 A. I believe -- that's Pathways. 12:58PM

19 Q. Pathways. Which is one of the 24 regional 12:58PM
20 GNETS? 12:58PM

21 A. Mm-hmm. 12:58PM

22 Q. Yes? 12:58PM

23 A. Yes. I'm sorry. 12:58PM

24 Q. And then -- so similar e-mails like this went 12:58PM
25 out to the other regional GNETS programs? 12:58PM

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1 A. If they needed revision, yes. 12:58PM

2 Q. Okay. Do you give them a timeline on when to 12:58PM
3 resubmit? 12:58PM

4 A. Yes. I'm not sure what the timeline was at 12:58PM
5 that time, though. 12:58PM

6 Q. And does this function still exist given the 12:58PM
7 change in the strategic plan? 12:58PM

8 A. No, because we no longer do it like this, so 12:58PM
9 no. 12:58PM

10 Q. Okay. If it's okay, I just have one document 12:58PM
11 to look at and then we can break. 12:58PM

12 A. Okay. 12:58PM

13 Q. Okay. 12:58PM

14 MS. TUCKER: I'd like the Court Reporter to 12:59PM
15 mark this document as Plaintiff's Exhibit 428. 12:59PM

16 (Plaintiff's Exhibit 428 marked for 12:59PM
17 identification.) 12:59PM

18 Q. BY MS. TUCKER: The Bates number on the first 12:59PM
19 page of this document is GA00963511. This is an e-mail 12:59PM
20 thread with the most recent e-mail dated November 30th, 12:59PM
21 2020. And it's an e-mail from you to Moria Lenka, 12:59PM
22 Upendra Nara, Vickie Cleveland, and -- 12:59PM

23 A. Udia. 12:59PM

24 Q. Udia. Thank you. Udia Arumugam. Did I get 12:59PM
25 that close? 12:59PM

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1 A. Close enough. 12:59PM

2 Q. Okay. It's spelled A-R-U-M-U-G-A-M. 12:59PM

3 The subject reads: "Draft Coastal Academy 01:00PM
4 FY '20 strategic plan results." 01:00PM

5 Dr. Stevenson, do you recognize this 01:00PM
6 e-mail? 01:00PM

7 A. Yes. 01:00PM

8 Q. Let's go through the two fields. Who -- can 01:00PM
9 you identify the folks listed in the two fields? 01:00PM

10 A. They are Moria, Upendra, and Udia. 01:00PM

11 Q. Okay. 01:00PM

12 A. They are all IT. 01:00PM

13 Q. Okay. And let's start with the oldest e-mail 01:00PM
14 in the thread, which begins on GA00963514. 01:00PM

15 A. (Witness complying.) 01:00PM

16 Q. Do you see it's sent Tuesday, November 24th, 01:00PM
17 2020 at 1459? 01:00PM

18 A. Mm-hmm. 01:00PM

19 Q. And it starts with, "Dear Lisa Futch"? 01:00PM

20 A. Mm-hmm. 01:00PM

21 Q. Was that a yes? 01:00PM

22 A. Yes. I'm sorry. 01:00PM

23 Q. Who is Lisa Futch? 01:00PM

24 A. Director in the GNETS program for Coastal 01:01PM
25 Academy. 01:01PM

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1 first paragraph. Do you see it?

01:02PM

2 MS. JOHNSON: (Indicating.)

01:02PM

3 THE WITNESS: Okay. Yes. I'm sorry.

01:02PM

4 Q. BY MS. TUCKER: I can read it again. "At the
5 end of the school year, the teams completed their final
6 ratings and prepared for a virtual review from the GNETS
7 state program manager and program specialist."

01:02PM

01:02PM

01:02PM

01:02PM

8 A. Mm-hmm.

01:02PM

9 Q. When this was drafted in 2020, was it going out
10 to every program?

01:02PM

01:02PM

11 A. The programs that received the virtual review.

01:02PM

12 Q. How many programs received the virtual review?

01:02PM

13 A. I don't remember.

01:02PM

14 Q. It was not all 24?

01:02PM

15 A. Not in 2020.

01:03PM

16 Q. How was it decided which programs received
17 virtual review?

01:03PM

01:03PM

18 A. Well, we weren't doing in-person, so that's how
19 that was decided.

01:03PM

01:03PM

20 Q. But what about the number of programs?

01:03PM

21 A. We decided to be in line with the RDA unit, and
22 they do Cross Functioning Monitoring on a three-year
23 cycle.

01:03PM

01:03PM

01:03PM

24 Q. Okay.

01:03PM

25 A. So to be on -- to be in line with them, we went

01:03PM

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1	A. Georgia Department -- GaDOE.	02:10PM
2	Q. Okay. You said you provide updates?	02:10PM
3	A. Mm-hmm.	02:10PM
4	Q. Updates on what?	02:10PM
5	A. Updates on changes that might be made to the	02:10PM
6	schedule for our monthly meetings or updates on due	02:10PM
7	dates for certain things or updates on webinars that are	02:10PM
8	going to be provided, not by us but by other people	02:10PM
9	outside on maybe special design instructions or things	02:10PM
10	like that. So just to make sure that they're aware of	02:10PM
11	those type of things that could be offered to them.	02:10PM
12	Q. Who sets the agenda for the monthly meetings?	02:10PM
13	A. Vickie usually, and myself.	02:10PM
14	Q. In consultation with you?	02:10PM
15	A. Mm-hmm.	02:10PM
16	Q. Are the agendas sent out in advance to the	02:10PM
17	regional GNETS programs?	02:10PM
18	A. No.	02:10PM
19	Q. I am going to introduce an exhibit that has	02:10PM
20	paper, but also there's going to be an electronic	02:10PM
21	component.	02:11PM
22	A. Okay.	02:11PM
23	MS. TUCKER: I'd like the Court Reporter to	02:11PM
24	mark this document as Plaintiff's Exhibit 429.	02:11PM
25	(Plaintiff's Exhibit 429 marked for	02:11PM

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1 identification.)

2 Q. BY MS. TUCKER: The Bates number on the bottom
3 of this documents reads, GA00956689. This is a
4 May 26th, 2020 e-mail from Vickie Cleveland to you. The
5 subject of the e-mail reads: "Draft responses." And
6 there is one attachment titled: "Copy of copy GNETS
7 director meeting questions, 2020-05-26."

8 A. (Witness examining document.)

9 Q. Dr. Stevenson, do you recognize this e-mail?

10 A. Yes.

11 Q. Yes?

12 A. Yes.

13 Q. Okay. We're going to turn to the attachment
14 which starts with GA00956690. But this is a
15 spreadsheet, so my colleague Megan Erickson is going to
16 share the screen and then you'll be able to access it.

17 THE VIDEOGRAPHER: And just let me know if
18 there's any issue with the screen share.

19 MS. TUCKER: I think it's about to happen.

20 Q. BY MS. TUCKER: Great. And then do you have
21 control over the document, Dr. Stevenson? I know you
22 see it.

23 A. Yes, I do.

24 Q. Okay. So you are able to manipulate and zoom
25 in and --

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1	A. Well, I can move the mouse.	02:12PM
2	Q. Okay. Are you able to zoom in?	02:12PM
3	THE VIDEOGRAPHER: Oh, you might have to	02:12PM
4	hit the plus sign or you can do this with your fingers	02:12PM
5	on the mouse pad.	02:13PM
6	THE WITNESS: Oh.	02:13PM
7	THE VIDEOGRAPHER: Do you want me to go off	02:13PM
8	the record?	02:13PM
9	MS. TUCKER: Yes, let's go off the record	02:13PM
10	just real quick.	02:13PM
11	THE VIDEOGRAPHER: All right. Off the	02:13PM
12	record at 2:14 p.m.	02:13PM
13	(Off the record at 2:14 p.m.)	02:13PM
14	THE VIDEOGRAPHER: Back on the record at	02:15PM
15	2:16 p.m.	02:15PM
16	Q. BY MS. TUCKER: Dr. Stevenson, are you now	02:15PM
17	looking at the spreadsheet that we identified as	02:15PM
18	GA0095690?	02:15PM
19	A. Yes.	02:15PM
20	Q. Okay. Do you recognize this spreadsheet?	02:15PM
21	A. Yes.	02:15PM
22	Q. Did you create it?	02:15PM
23	A. I created a form in Jotform --	02:15PM
24	Q. Okay.	02:15PM
25	A. -- where the GNETS directors -- since we were	02:15PM

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1 going virtual.

02:15PM

2 Q. Okay.

02:15PM

3 A. This would give them an opportunity to have
4 their questions answered ahead of time so we can make
5 sure that they were addressed.

02:15PM

02:15PM

02:15PM

6 Q. Okay. What is Jotform?

02:15PM

7 A. Jotform is a platform you can use to create
8 documents and send out to people for various things, so
9 I just used that to create this. And then after -- and
10 then it will automatically put it on Excel, if you
11 request it.

02:16PM

02:16PM

02:16PM

02:16PM

02:16PM

12 Q. Got it. And is this a form that you created
13 that then the regional GNETS directors could add to it?

02:16PM

02:16PM

14 A. Well, I would -- the Jotform would just say,
15 "Questions for monthly directors meeting," and then I
16 would send the link out.

02:16PM

02:16PM

02:16PM

17 Q. Okay.

02:16PM

18 A. And then they would put whatever questions they
19 would have for the upcoming meeting, that they might
20 need answered, so we could make sure that they were
21 addressed.

02:16PM

02:16PM

02:16PM

02:16PM

22 Q. And is this practice of answering questions
23 in -- having questions to answer in advance, is that
24 standard practice for your GNETS meetings with the
25 regional directors?

02:16PM

02:16PM

02:16PM

02:16PM

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1 A. It's wasn't -- it's not necessarily standard 02:16PM
2 practice, but in other departments within GaDOE we've 02:16PM
3 seen that and how it ensured that everybody's questions 02:16PM
4 got answered, so we thought it would be a good practice 02:17PM
5 to try to start using. 02:17PM

6 Q. Are you currently using this practice? 02:17PM

7 A. We -- we've only had one meeting, two meetings, 02:17PM
8 this year and I haven't done a Jotform for the meeting 02:17PM
9 so far this year. 02:17PM

10 Q. Have regional GNETS directors reached out with 02:17PM
11 questions in advance of the monthly meetings separate 02:17PM
12 from the Jotform? 02:17PM

13 A. Sometimes they'll have questions just in 02:17PM
14 general, but there might be questions that we're going 02:17PM
15 to address at the meeting. 02:17PM

16 Q. So am I correct, looking at this spreadsheet, 02:17PM
17 there's text and black font? 02:17PM

18 A. Mm-hmm. 02:17PM

19 Q. Those are the questions that you put in, that 02:17PM
20 you received from the regional GNETS directors? 02:17PM

21 A. Those are the questions that they put in 02:17PM
22 themselves. 02:17PM

23 Q. Okay. 02:18PM

24 A. So I didn't put in any questions. I just sent 02:18PM
25 a link and they had to select, you know, question, and 02:18PM

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1 then what their question was in regards to, and then
2 they put their questions in there.

3 Q. Did they also identify the topic or did you
4 identify --

5 A. They had options to choose from for the topic.

6 Q. Okay. And now I see answers in red, red front?

7 A. Yes.

8 Q. Who wrote the red font?

9 A. Vickie.

10 Q. Vickie. Okay. And are these red font answers
11 something that you would share in advance of the meeting
12 or is this something that you would discuss at the
13 meeting?

14 A. These would be the answers Vickie would give
15 them at the meeting.

16 Q. Verbally?

17 A. Yes.

18 Q. Did Vickie ask you to create a spreadsheet like
19 this through Jotform?

20 A. No. Like I said, we just thought it would be a
21 good idea to make sure questions were being addressed.

22 Q. The last two meetings that you've had this
23 school year, you think one or two?

24 A. Mm-hmm.

25 Q. Did any regional GNETS directors send you

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1 general.

02:42PM

2 Q. Do you and Vickie receive information, like,
3 called out for the GNETS students?

02:42PM

02:42PM

4 A. I don't know if they have that disseminated or
5 broken up by GNETS specifics for dropouts.

02:42PM

02:42PM

6 Q. Okay. I'm going to give you another one that
7 has an electronic component.

02:43PM

02:43PM

8 A. Okay.

02:43PM

9 MS. TUCKER: I'm handing the Court Reporter
10 what I would like marked as Plaintiff's Exhibit 431.

02:43PM

02:43PM

11 (Plaintiff's Exhibit 431 marked for
12 identification.)

02:43PM

02:43PM

13 Q. BY MS. TUCKER: This is a September 4th, 2019
14 e-mail from you to the regional GNETS program directors,
15 and Vickie Cleveland is copied. The Bates number on the
16 first page of this exhibit reads GA00951657. The
17 subject reads: "Social worker logs." And there's one
18 attachment.

02:43PM

02:43PM

02:43PM

02:43PM

02:43PM

02:44PM

19 A. (Witness examining document.)

02:44PM

20 Q. Dr. Stevenson, do you recognize this e-mail?

02:44PM

21 A. Yes.

02:44PM

22 Q. Okay. And am I correct that you write that
23 GaDOE requires monthly logs detailing the therapeutic
24 services provided by social workers?

02:44PM

02:44PM

02:44PM

25 A. Mm-hmm. Yes.

02:44PM

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1 Q. Is this to all regional GNETS program
2 directors?

3 A. 11.

4 Q. 11. And these are the 11 that receive the
5 grant?

6 A. The therapeutic grant.

7 Q. Okay. We just -- we'll be good without talking
8 over one another.

9 What do you do with the information once
10 you receive it?

11 A. I log that it has been submitted and then at
12 the end of the year I do a summary.

13 Q. Okay. And that's the summary we looked at
14 earlier?

15 A. Yes.

16 Q. Is this still current practice?

17 A. Yes.

18 Q. Okay. I want you to look at the spreadsheet,
19 which was produced in its native format so my colleague
20 will show it through Zoom. Let me know when you can see
21 it, Dr. Stevenson.

22 A. I can see it.

23 Q. Okay. Dr. Stevenson, did you create this
24 spreadsheet?

25 A. I'm not sure if I created it or not, or if it

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1 MS. JOHNSON: Yes.

2 MS. TUCKER: I'll just start back, so we're
3 on the same page.

4 MS. JOHNSON: Okay.

5 Q. BY MS. TUCKER: I handed you what was
6 identified already as Plaintiff's Exhibit 387?

03:05PM

7 A. Yes.

03:05PM

8 Q. Okay. And this is an e-mail thread with the
9 most recent e-mail dated November 2nd, 2020 from you to
10 Vickie Cleveland, and the subject is: "Form." There is
11 one attachment.

03:05PM

03:05PM

03:05PM

03:05PM

12 Dr. Stevenson, do you recognize this e-mail
13 thread?

03:05PM

03:05PM

14 A. Yes.

03:05PM

15 Q. Okay. Let's go down to the first e-mail in the
16 thread, which is at the bottom of GA00363543. And this
17 is a October 30th, 2020 e-mail to Joanna Mock from
18 Whitney Braddock. Do you see that e-mail?

03:05PM

03:05PM

03:06PM

03:06PM

19 A. Yes.

03:06PM

20 Q. Okay. Who are Whitney Braddock and Joanna
21 Mock?

03:06PM

03:06PM

22 A. GNETS directors.

03:06PM

23 Q. For which programs?

03:06PM

24 A. Whitney is for Cedarwood and Joanna Mock is for
25 Heartland?

03:06PM

03:06PM

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1 Q. Okay. And do you see where Joanna writes: "I
2 used the form that Lakesha sent to us and made a Word
3 document." Do you see that?

4 A. Yes.

5 Q. Okay. What form did you send the regional
6 GNETS directors?

7 A. (Witness examining document.) The form that
8 was, basically, what you see in the attachment.

9 Q. Okay. And you're saying that the form included
10 the information in the attachment, which starts at
11 GA00363545 --

12 A. (Witness examining document.)

13 Q. -- at the bottom; is that correct?

14 A. (Witness examining document.) Yes.

15 Q. And then the whole form which goes through
16 GA00363546 and GA00363547?

17 A. Not the form but information -- some of the
18 information that's in the form.

19 Q. Is there information in this form that you did
20 not request?

21 A. It's in a different manner in which it was
22 requested.

23 Q. What manner did you request it in?

24 A. I don't remember the specifics.

25 Q. But you remember it's different?

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1 A. I remember that this is not the exact form that 03:07PM
2 I sent, but it is very similar. 03:07PM

3 Q. Okay. And you were requesting this information 03:08PM
4 from the regional GNETS directors? 03:08PM

5 A. Yes. 03:08PM

6 Q. Okay. When you requested this from the 03:08PM
7 regional GNETS directors, what did you communicate? 03:08PM

8 A. What I put in the e-mail? 03:08PM

9 Q. Yeah. 03:08PM

10 A. I don't remember. 03:08PM

11 Q. Or a phone call? 03:08PM

12 A. I don't remember. 03:08PM

13 Q. Did you originally send it via e-mail? 03:08PM

14 A. I think so. 03:08PM

15 Q. Okay. 03:08PM

16 A. I think so. 03:08PM

17 Q. And you solely requested the information? 03:08PM

18 A. Just a little bit more clarity, I'm sorry. 03:08PM

19 Q. Yeah. Did you provide context on why you were 03:08PM
20 requesting this information to the regional GNETS 03:08PM
21 program directors? 03:08PM

22 A. I'm not sure because I don't remember how that 03:08PM
23 communication went out. 03:08PM

24 Q. Okay. Let's go back to the e-mail thread. 03:08PM

25 Am I correct that Joanna Mock then sends 03:09PM